

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HEADWATER RESEARCH LLC

Plaintiff,

v.

SAMSUNG ELECTRONICS CO., LTD and
SAMSUNG ELECTRONICS AMERICA, INC.,

Defendants.

Case No. 2:23-cv-00641-JRG-RSP

JURY TRIAL DEMANDED

NOTICE OF RELATED PROCEEDINGS IN OTHER JUDICIAL DISTRICT

Defendants Samsung Electronic Col, Ltd. and Samsung Electronics America, Inc. (collectively “Samsung”) respectfully file this Notice of Related Proceedings and notify the Court that on May 7, 2025, Plaintiff Headwater Research LLC (“Headwater”) filed a separate Motion to Quash in the District Court for the Northern District of California, San Jose Division. *In re Subpoena to Krista Jacobsen*, No. 3:25-mc-80104 (N.D. Cal.). In this motion, Headwater (1) seeks an Order quashing Samsung’s April 7, 2025 subpoena for non-party Krista Jacobsen (“Ms. Jacobsen”) to produce documents and sit for deposition, or, alternatively, (2) transfer of the proceeding to the United States District Court for the Eastern District of Texas pursuant to Fed. R. Civ. P. 45(f). Samsung will not oppose the requested transfer.

Dated: May 9, 2025

Respectfully submitted,

By: /s/Thad C. Kodish

Ruffin B. Cordell

TX Bar No. 04820550

Michael J. McKeon

DC Bar No. 459780

Jared Hartzman (*pro hac vice*)

DC Bar No. 1034255

FISH & RICHARDSON P.C.

1000 Maine Avenue, SW, Ste 1000
Washington, D.C. 20024
Telephone: (202) 783-5070
SERVICEFRSamsung-Headwater@fr.com

Thad C. Kodish
GA Bar No. 427603
Sara C. Fish
GA Bar No. 873853
Christopher O. Green
GA Bar No. 037617
Benjamin K. Thompson
GA Bar No. 633211
Steffen C. Lake
GA Bar No. 512272
Ashley A. Bolt
GA Bar No. 231197
Erin P. Alper
GA Bar No. 940408
Peter Hong (*pro hac vice*)
GA Bar No. 365188
FISH & RICHARDSON P.C.
1180 Peachtree St. NE, Fl. 21
Atlanta, GA 30309
Telephone: (404) 892-5005
SERVICEFRSamsung-Headwater@fr.com

John-Paul Fryckman (*pro hac vice*)
CA Bar No. 317591
FISH & RICHARDSON P.C.
12860 El Camino Real Suite 400
San Diego, CA 92130
Telephone: (858) 678-5070
SERVICEFRSamsung-Headwater@fr.com

Melissa R. Smith
State Bar No. 24001351
Melissa@gillamsmithlaw.com
GILLAM & SMITH, LLP
303 South Washington Avenue
Marshall, Texas 75670
Telephone: (903) 934-8450

Harry L. Gillam, Jr.
State Bar No. 07921800
GILLAM & SMITH, LLP

102 N. College, Ste. 800
Tyler, Texas 75702
Telephone: (903) 934-8450

Jon Hyland
Texas Bar No. 24046131
jhyland@hilgersgraben.com
Grant K. Schmidt
Texas Bar No. 24084579
gschmidt@hilgersgraben.com
HILGERS GRABEN PLLC
7859 Walnut Hill Lane, Suite 335
Dallas, Texas 75230
Telephone: (972) 645-3097

ATTORNEYS FOR DEFENDANTS
SAMSUNG ELECTRONICS CO., LTD. AND
SAMSUNG ELECTRONICS AMERICA, INC.

CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served on May 9, 2025, with a copy of this document via the Court's CM/ECF.

/s/ Thad C. Kodish

Thad C. Kodish